

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FINJAN SOFTWARE, LTD., an Israel
corporation,

Plaintiff-Counterdefendant,

v.

SECURE COMPUTING CORPORATION, a
Delaware corporation; CYBERGUARD
CORPORATION, a Delaware corporation,
WEBWASHER AG, a German corporation and
DOES 1 THROUGH 100,

Defendants-Counterclaimants.

C. A. No. 06-369 GMS

Trial Date: March 3, 2008

**SECURE COMPUTING CORPORATION'S
PROPOSED VOIR DIRE PURSUANT TO L.R. 47.1**

1. Name
2. Age
3. Gender
4. Trial is expected to last about 7 business days. Will the length of this trial cause hardship?
5. Do you have any health problems that might affect service? Is there a way for the court/parties to accommodate you?
6. This case will involve written technical materials. Are you able to read, write and understand English fluently?
7. Do you speak a foreign language? If so, which one?
8. What is your marital status?
9. Do you have children?
10. What is your educational background?
 - A. For those with a college degree, in what subject did you major or minor?
 - B. For those with a college degree, do you have additional education? In what area?
11. Have you, your spouse or significant other taken any courses or had training in any of the following areas?
 - A. Law
 - B. Computers or Computer Science
 - C. Science
 - D. Engineering
 - E. Architecture
 - F. Sales or Marketing
 - G. Accounting
 - H. Economics
 - I. Patent application/obtaining a patent

12. Are you currently employed?
13. If so, what is your current occupation?
14. What is your spouse's or significant other's employment status?
15. What is the current occupation of your spouse or significant other?
16. Have you, or any family member or close friend ever worked for an attorney, law firm, judge or court?
17. Have you, or any family member or close friend ever served in the military?
18. If you have served in the military, what was your rank at time of discharge?
19. If you have served in the military, how many years did you serve?
20. Have you ever been employed by the government?
21. Do you think government workers are generally competent at their jobs?
22. In this lawsuit, Finjan Software, Ltd. is suing Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG for infringing patents involving computer network and system security. Secure Computing Corporation is suing Finjan Software, Ltd. and Finjan Software, Inc. for infringing patents of similar nature.

A. Have you ever heard of this lawsuit?

23. Is there a personal computer in your home?
24. Do you use a personal computer at home or at work?
25. Have you ever installed software or hardware on a personal computer?
26. Have you ever done any computer programming?
27. Do you read technical or computer-related publications or magazines?
28. Have you, any family member or close friend, worked in the manufacture, distribution, or sale of products involving computers?
29. Have you or any family member or close friend ever worked in a field that involves knowledge of procedures involving computer security?
30. Have you or any family member or close friend ever worked in retail sales of products involving computers?
31. Have you, any family member or close friend ever been employed by or had any business affiliation or association with the parties in this case?

- A. Finjan Software, Ltd.?
 - B. Finjan Software, Inc.?
 - C. Secure Computing Corporation?
 - D. Cyberguard Corporation?
 - E. Webwasher AG?
32. Have you, any family member or close friend every been employed by or had any business affiliation with any of the following companies:
- A. Symantec Corporation
 - B. McAfee
 - C. Trend Micro
 - D. Network Associates
 - E. CipherTrust
 - F. Sun Microsystems
 - G. Blue Coat
 - H. Alchemedia
 - I. Sophos
 - J. Kaspersky
 - K. Webroot
 - L. Microsoft
33. Robins, Kaplan, Miller & Ciresi L.L.P. and Richards, Layton & Finger, P.A. will be representing Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG in this case. Have you had any dealings with the lawyers or employees of that firm?
- A. Frederick Cottrell III
 - B. Kelly Farnan
 - C. Ronald Schutz
 - D. Jake Holdreith

E. Christopher Seidl

F. Trevor Foster

G. Amy Moravetz

34. Perkins Coie LLP and Potter Anderson & Corroon LLP will be representing Finjan Software, Ltd. and Finjan Software, Inc. in this case. Have you had any dealings with the lawyers or employees of that firm?

A. Philip A. Rovner

B. Lisa Kobialka

C. Meghan Wharton

D. James Hannah

E. Zhuanjia Gu

F. Kris Kastens

G. Hannah Lee

H. Steve Dennison

35. Have you ever invented something that is unique that you wanted to market?
36. Do you know anyone who has invented something?
37. Have you ever applied for a patent, trademark or copyright?
38. Do you know anyone who has applied for a patent, trademark or copyright?
39. Do you think it is difficult to get a patent?
40. Do you think giving someone a patent for an invention is a good idea?
41. Have you or do you know anyone who has been involved in a patent, trademark, or copyright dispute?
42. Do you approve or disapprove of intellectual property lawsuits, such as lawsuits about protecting patent rights to inventions?
43. In your work or hobbies, do you ever deal with patents, trademarks or copyrights?

44. Do you think that the United States government does a good job of deciding what kinds of inventions should be given a United States patent?
45. Generally, what type of experiences have you had with agencies of the federal government?
46. There is some discussion in this country about the verdict amounts being awarded by juries. Some believe juries are giving verdict amounts that are too high and others believe that juries are giving verdict amounts that are too low. Some believe that verdict amounts are about right. Do you have a strong opinion about the verdict amounts awarded by juries these days?
47. Do you think there are too many lawsuits today?
48. Have you ever filed a legal claim or sued any other party in a court of law?
49. Have you ever been sued by another party or had a legal claim filed against you?
50. Have you ever been a witness in a lawsuit where you were asked to testify under oath?
51. Has anyone close to you ever filed a legal claim or sued any other party in a court of law?
52. Has anyone close to you ever been sued by another party or had a legal claim filed against them?
53. Has anyone close to you ever been a witness in a lawsuit where they were asked to testify under oath?
54. Has any employer of yours, past or present, ever sued someone else? If so, what was the nature of the lawsuit? What was your personal involvement, if any in that process?
55. Have you ever served on a jury or a grand jury?
56. If you served on a jury, did the jury reach a verdict? What was it?
57. Have you ever traveled or lived in a foreign country?
58. Secure Computing Corporation was founded and is based in the United States. One of the parties, Webwasher AG, was founded and was based in Germany. Do you have any concerns about a company that was founded and based in Germany?
59. Do you have any concerns towards individuals who are German citizens or whose native tongue is German?
60. Have you ever worked in a supervisory or management position?
61. Do you know anyone in the courtroom?
62. Do you know any of the potential witnesses in this case?

A. Giovanni Vigna
B. Matt Bishop
C. Russell Parr
D. Todd Heberlein
E. Trent Jaeger
F. Yuval Ben-Itzhak
G. Asher Polani
H. Christoph Alme
I. Dan Frommer
J. David Kroll
K. Elizabeth Lally
L. Ezra Sofer
M. Frank Berzau
N. Jan Schnellbacher
O. Jill Putman
P. John Vigourouz
Q. Limor Elbaz
R. Martin Stecher
S. Michael Gallagher
T. Nimrod Vered
U. Paula Greve
V. Peter Borgotle
W. Roland Scholz
X. Ron Kraistman
Y. Shlomo Touboul

Z. Steven Chew

AB. Yigal Edery

AC. Dan Wallach

AD. Carl Degen

AE. Sarah Kaye

AF. Matt Galligan

AG. Rick Kruse

63. It is difficult to think of all of the questions that might relate to your thoughts about this case. Is there any reason not covered by the previous questions why you think you could not serve as a fair and impartial juror in this case?
64. Based on everything you have heard so far, do you believe you could sit as a fair and impartial juror in this case?

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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on January 7, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY HAND DELIVERY AND E-MAIL

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I hereby certify that on January 7, 2008 I have sent by E-mail the foregoing document to the following non-registered participants:

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